

EXHIBIT F

PAUL ROTH Vol. I Highly Confidential
IN RE: TELESCOPES ANTITRUST LITIGATION

August 07, 2023

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: TELESCOPES ANTITRUST
LITIGATION

No. 5:20-cv-03639-EJD

NO. 5:20-cv-03642-EJD

* * * HIGHLY CONFIDENTIAL * * *

REMOTE VIDEOTAPED 30(b)(1) DEPOSITION OF PAUL ROTH

August 7, 2023

VOLUME I

Stenographically Reported by:

Bonnie Pruszynski, RMR, CA CSR No. 13064
Job No. J10007769

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1 THE VIDEOGRAPHER: We are going on the
2 record at 9:06 a.m. on August 7th, 2023. This
3 begins the video conference deposition of Paul
4 Roth, taken in In Re: Telescopes Antitrust
5 Litigation, being heard before the United
6 States District Court, Northern District of
7 California, Case Numbers 5:20-CV-03639-EJD,
8 and 5:20-CV-03642-EJD.

9 My name is Mike Cooper. The court
10 reporter is Bonnie Pruszynski, and we
11 represent Esquire Deposition Solutions.

12 Will all counsel present please
13 introduce yourselves and whom you represent?

14 MR. LEVINE: Andrew Levine on behalf of
15 the plaintiff direct purchasers.

16 MS. CASTILLO: Good morning. Elizabeth
17 Castillo on behalf of the indirect purchaser
18 plaintiffs.

19 MR. FROST: Christopher Frost here on
20 behalf of the defendants, other than Ningbo
21 Sunny, and the witness, Paul Roth.

22 THE VIDEOGRAPHER: Thank you.

23 Will the court reporter please swear in
24 the witness.

25 (Witness sworn.)

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1 A. By the purchaser would be Celestron, the
2 company, but the purchasing team negotiates with
3 our vendors on the payment terms.

4 Q. Are you familiar with Sunny's
5 acquisition of Meade in 2013?

6 A. I know that they acquired Meade, yes.

7 Q. Okay. Were you involved in that
8 acquisition?

9 A. I would like to understand, that when
10 you say "involved," Ningbo Sunny acquired Meade,
11 an entity. I was not involved in them acquiring
12 Meade, no.

13 Q. You didn't have discussions and meetings
14 regarding Ningbo Sunny's acquisition of Meade?

15 A. I do not recall having discussions or
16 meetings to -- I can't remember what word you
17 used -- for their acquisition of Meade.

18 Q. You don't recall writing e-mails and
19 creating entity structure charts for how Ningbo
20 Sunny's acquisitions of Meade would be structured?

21 A. I do not recall how they were
22 structured, but I do recall that after the
23 acquisition took place, you know, we're looking at
24 Ningbo Sunny and trying to assess them as a
25 vendor, their financial viability.

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1 C E R T I F I C A T E

2 I, Bonnie Pruszynski, RPR, RMR, do
3 hereby certify that on August 7, 2023,
4 appeared before me, PAUL ROTH.5 I further certify that the said
6 witness was first duly sworn to testify to the truth
7 in the cause aforesaid.8 I further certify that the signature
9 of the witness to the foregoing deposition was not
10 specified by counsel.11 I further certify that I am not
12 counsel for nor in any way related to any of the
13 parties to this suit, nor financially interested in
14 the action.15 IN WITNESS WHEREOF, I have hereunto
16 set my hand this 16th of August, 2023.17 
1819 Bonnie Pruszynski
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